

AS TO COUNT VII

560. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 559 of the plaintiff's complaint and incorporate them herein by reference.

561. The defendants deny the allegations contained in paragraph 561 of the plaintiff's complaint.

562. The defendants deny the allegations contained in paragraph 562 of the plaintiff's complaint.

563. The defendants deny the allegations contained in paragraph 563 of the plaintiff's complaint.

564. The defendants deny the allegations contained in paragraph 564 of the plaintiff's complaint.

565. The defendants neither admit nor deny the allegations contained in paragraph 565 of the plaintiff's complaint as they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and leave the plaintiff to his burden of proof.

566. The defendants deny the allegations contained in paragraph 566 of the plaintiff's complaint.

567. The defendants deny the allegations contained in paragraph 567 of the plaintiff's complaint.

568. The defendants deny the allegations contained in paragraph 568 of the plaintiff's complaint.

569. The defendants deny the allegations contained in paragraph 569 of the plaintiff's complaint.

570. The defendants admit the allegations contained in paragraph 570 of the plaintiff's complaint. To the extent paragraph 570 alleges any wrongdoing, the defendants deny the allegations contained in paragraph 570 of the plaintiff's complaint.

571. The defendants deny the allegations contained in paragraph 571 of the plaintiff's complaint.

572. The defendants deny the allegations contained in paragraph 572 of the plaintiff's complaint.

573. The defendants deny the allegations contained in paragraph 573 of the plaintiff's complaint.

AS TO COUNT VIII

574. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 573 of the plaintiff's complaint and incorporate them herein by reference.

575. The defendants deny the allegations contained in paragraph 575 of the plaintiff's complaint.

576. The defendants deny the allegations contained in paragraph 576 of the plaintiff's complaint.

AS TO COUNT IX

577. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 576 of the plaintiff's complaint and incorporate them herein by reference.

578. The defendants deny the allegations contained in paragraph 578 of the plaintiff's complaint.

579. The defendants deny the allegations contained in paragraph 579 of the plaintiff's complaint.

580. The defendants deny the allegations contained in paragraph 580 of the plaintiff's complaint.

AS TO COUNT X

581. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 580 of the plaintiff's complaint and incorporate them herein by reference.

582. The defendants deny the allegations contained in paragraph 582 of the plaintiff's complaint.

583. The defendants deny the allegations contained in paragraph 583 of the plaintiff's complaint.

584. The defendants deny the allegations contained in paragraph 584 of the plaintiff's complaint.

585. The defendants deny the allegations contained in paragraph 585 of the plaintiff's complaint.

586. The defendants deny the allegations contained in paragraph 586 of the plaintiff's complaint.

587. The defendants deny the allegations contained in paragraph 587 of the plaintiff's complaint.

588. The defendants deny the allegations contained in paragraph 588 of the plaintiff's complaint.

589. The defendants deny the allegations contained in paragraph 589 of the plaintiff's complaint.

590. The defendants deny the allegations contained in paragraph 590 of the plaintiff's complaint.

591. The defendants admit the allegations contained in paragraph 591 of the plaintiff's complaint. To the extent paragraph 590 alleges any wrongdoing, the defendants deny the allegations contained in paragraph 590 of the plaintiff's complaint.

592. The defendants deny the allegations contained in paragraph 592 of the plaintiff's complaint.

AS TO COUNT XI

593. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 592 of the plaintiff's complaint and incorporate them herein by reference.

594. The defendants deny the allegations contained in paragraph 594 of the plaintiff's complaint.

595. The defendants deny the allegations contained in paragraph 595 of the plaintiff's complaint.

596. The defendants admit the allegations contained in paragraph 596 of the plaintiff's complaint.

597. The defendants deny the allegations contained in paragraph 597 of the plaintiff's complaint.

598. The defendants deny the allegations contained in paragraph 598 of the plaintiff's complaint.

599. The defendants deny the allegations contained in paragraph 599 of the plaintiff's complaint.

600. The defendants deny the allegations contained in paragraph 600 of the plaintiff's complaint.

601. The defendants deny the allegations contained in paragraph 601 of the plaintiff's complaint.

602. The defendants deny the allegations contained in paragraph 602 of the plaintiff's complaint.

603. The defendants deny the allegations contained in paragraph 603 of the plaintiff's complaint.

604. The defendants admit the allegations contained in paragraph 604 of the plaintiff's complaint. To the extent paragraph 604 alleges any wrongdoing, the defendants deny the allegations contained in paragraph 604 of the plaintiff's complaint.

605. The defendants deny the allegations contained in paragraph 605 of the plaintiff's complaint.

606. The defendants deny the allegations contained in paragraph 606 of the plaintiff's complaint.

607. The defendants deny the allegations contained in paragraph 607 of the plaintiff's complaint.

AS TO COUNT XII

608. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 607 of the plaintiff's complaint and incorporate them herein by reference.

609. The defendants deny the allegations contained in paragraph 609 of the plaintiff's complaint.

610. The defendants deny the allegations contained in paragraph 610 of the plaintiff's complaint.

AS TO COUNT XIII

611. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 610 of the plaintiff's complaint and incorporate them herein by reference.

612. The defendants deny the allegations contained in paragraph 612 of the plaintiff's complaint.

613. The defendants deny the allegations contained in paragraph 613 of the plaintiff's complaint.

614. The defendants deny the allegations contained in paragraph 614 of the plaintiff's complaint.

AS TO COUNT XIV

615. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 614 of the plaintiff's complaint and incorporate them herein by reference.

616. The defendants deny the allegations contained in paragraph 616 of the plaintiff's complaint.

617. The defendants deny the allegations contained in paragraph 617 of the plaintiff's complaint.

AS TO COUNT XV

618. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 617 of the plaintiff's complaint and incorporate them herein by reference.

619. The defendants deny the allegations contained in paragraph 616 of the plaintiff's complaint.

620. The defendants deny the allegations contained in paragraph 620 of the plaintiff's complaint.

621. The defendants deny the allegations contained in paragraph 621 of the plaintiff's complaint.

AS TO COUNT XVI

622. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 621 of the plaintiff's complaint and incorporate them herein by reference.

623. The defendants deny the allegations contained in paragraph 623 of the plaintiff's complaint.

624. The defendants deny the allegations contained in paragraph 624 of the plaintiff's complaint.

625. The defendants deny the allegations contained in paragraph 625 of the plaintiff's complaint.

AS TO COUNT XVII

626. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 625 of the plaintiff's complaint and incorporate them herein by reference.

627. The defendants deny the allegations contained in paragraph 627 of the plaintiff's complaint.

628. The defendants deny the allegations contained in paragraph 628 of the plaintiff's complaint.

629. The defendants deny the allegations contained in paragraph 629 of the plaintiff's complaint.

AS TO COUNT XVIII

630. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 629 of the plaintiff's complaint and incorporate them herein by reference.

631. The defendants deny the allegations contained in paragraph 630 of the plaintiff's complaint.

632. The defendants deny the allegations contained in paragraph 632 of the plaintiff's complaint.

AS TO COUNT XIX

633. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 632 of the plaintiff's complaint and incorporate them herein by reference.

634. The defendants deny the allegations contained in paragraph 634 of the plaintiff's complaint.

635. The defendants deny the allegations contained in paragraph 635 of the plaintiff's complaint.

636. The defendants deny the allegations contained in paragraph 636 of the plaintiff's complaint.

AS TO COUNT XX

637. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 636 of the plaintiff's complaint and incorporate them herein by reference.

638. The defendants deny the allegations contained in paragraph 638 of the plaintiff's complaint.

639. The defendants deny the allegations contained in paragraph 639 of the plaintiff's complaint.

AS TO COUNT XXI

640. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 639 of the plaintiff's complaint and incorporate them herein by reference.

641. The defendants deny the allegations contained in paragraph 641 of the plaintiff's complaint.

642. The defendants deny the allegations contained in paragraph 642 of the plaintiff's complaint.

643. The defendants deny the allegations contained in paragraph 643 of the plaintiff's complaint.

AS TO COUNT XXII

644. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 643 of the plaintiff's complaint and incorporate them herein by reference.

645. The defendants deny the allegations contained in paragraph 645 of the plaintiff's complaint.

646. The defendants deny the allegations contained in paragraph 646 of the plaintiff's complaint.

AS TO COUNT XXIII

647. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 646 of the plaintiff's complaint and incorporate them herein by reference.

648. The defendants deny the allegations contained in paragraph 648 of the plaintiff's complaint.

649. The defendants deny the allegations contained in paragraph 649 of the plaintiff's complaint.

AS TO COUNT XXIV

650. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 649 of the plaintiff's complaint and incorporate them herein by reference.

651. The defendants deny the allegations contained in paragraph 651 of the plaintiff's complaint.

652. The defendants deny the allegations contained in paragraph 652 of the plaintiff's complaint.

653. The defendants deny the allegations contained in paragraph 653 of the plaintiff's complaint.

AS TO COUNT XXV

654. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 653 of the plaintiff's complaint and incorporate them herein by reference.

655. The defendants deny the allegations contained in paragraph 655 of the plaintiff's complaint.

656. The defendants deny the allegations contained in paragraph 656 of the plaintiff's complaint.

657. The defendants deny the allegations contained in paragraph 657 of the plaintiff's complaint.

AS TO COUNT XXVI

658. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 657 of the plaintiff's complaint and incorporate them herein by reference.

659. The defendants deny the allegations contained in paragraph 659 of the plaintiff's complaint.

660. The defendants deny the allegations contained in paragraph 660 of the plaintiff's complaint.

661. The defendants deny the allegations contained in paragraph 661 of the plaintiff's complaint.

AS TO COUNT XXVII

662. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 661 of the plaintiff's complaint and incorporate them herein by reference.

663. The defendants deny the allegations contained in paragraph 663 of the plaintiff's complaint.

664. The defendants deny the allegations contained in paragraph 664 of the plaintiff's complaint.

AS TO COUNT XXVIII

665. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 664 of the plaintiff's complaint and incorporate them herein by reference.

666. The defendants deny the allegations contained in paragraph 666 of the plaintiff's complaint.

667. The defendants deny the allegations contained in paragraph 667 of the plaintiff's complaint.

AS TO COUNT XXIX

668. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 667 of the plaintiff's complaint and incorporate them herein by reference.

669. The defendants deny the allegations contained in paragraph 669 of the plaintiff's complaint.

670. The defendants deny the allegations contained in paragraph 670 of the plaintiff's complaint.

AS TO COUNT XXX

671. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 670 of the plaintiff's complaint and incorporate them herein by reference.

672. The defendants deny the allegations contained in paragraph 672 of the plaintiff's complaint.

673. The defendants deny the allegations contained in paragraph 673 of the plaintiff's complaint.

674. The defendants deny the allegations contained in paragraph 674 of the plaintiff's complaint.

AS TO COUNT XXXI

675. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 674 of the plaintiff's complaint and incorporate them herein by reference.

676. The defendants deny the allegations contained in paragraph 676 of the plaintiff's complaint.

677. The defendants deny the allegations contained in paragraph 677 of the plaintiff's complaint.

678. The defendants deny the allegations contained in paragraph 678 of the plaintiff's complaint.

AS TO COUNT XXXII

679. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 678 of the plaintiff's complaint and incorporate them herein by reference.

680. The defendants deny the allegations contained in paragraph 680 of the plaintiff's complaint.

681. The defendants deny the allegations contained in paragraph 681 of the plaintiff's complaint.

682. The defendants deny the allegations contained in paragraph 682 of the plaintiff's complaint. Further answering, the defendants state that the allegation that petitioning the

government is a constitutionally protected activity calls for a legal conclusion to which the defendants are not obligated to respond.

683. The defendants deny the allegations contained in paragraph 683 of the plaintiff's complaint.

684. The defendants deny the allegations contained in paragraph 684 of the plaintiff's complaint.

685. The defendants deny the allegations contained in paragraph 6858= of the plaintiff's complaint.

686. The defendants deny the allegations contained in paragraph 686 of the plaintiff's complaint.

687. The defendants deny the allegations contained in paragraph 686 of the plaintiff's complaint.

688. The defendants deny the allegations contained in paragraph 688 of the plaintiff's complaint.

689. The defendants deny the allegations contained in paragraph 689 of the plaintiff's complaint.

690. The defendants deny the allegations contained in paragraph 690 of the plaintiff's complaint.

691. The defendants admit the allegations contained in paragraph 691 of the plaintiff's complaint. To the extent paragraph 691 alleges any wrongdoing, the defendants deny the allegations contained in paragraph 691 of the plaintiff's complaint.

692. The defendants deny the allegations contained in paragraph 692 of the plaintiff's complaint.

AS TO COUNT XXXIII

693. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 692 of the plaintiff's complaint and incorporate them herein by reference.

694. The defendants deny the allegations contained in paragraph 694 of the plaintiff's complaint.

695. The defendants deny the allegations contained in paragraph 695 of the plaintiff's complaint.

AS TO COUNT XXXIV

696. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 695 of the plaintiff's complaint and incorporate them herein by reference.

697. The defendants deny the allegations contained in paragraph 697 of the plaintiff's complaint.

698. The defendants deny the allegations contained in paragraph 698 of the plaintiff's complaint.

699. The defendants deny the allegations contained in paragraph 699 of the plaintiff's complaint.

AS TO COUNT XXXV

700. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 699 of the plaintiff's complaint and incorporate them herein by reference.

701. The defendants deny the allegations contained in paragraph 701 of the plaintiff's complaint.

702. The defendants deny the allegations contained in paragraph 702 of the plaintiff's complaint.

703. The defendants deny the allegations contained in paragraph 703 of the plaintiff's complaint.

AS TO COUNT XXXVI

704. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 703 of the plaintiff's complaint and incorporate them herein by reference.

705. The defendants deny the allegations contained in paragraph 705 of the plaintiff's complaint.

706. The defendants deny the allegations contained in paragraph 706 of the plaintiff's complaint.

AS TO COUNT XXXVII

707. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 706 of the plaintiff's complaint and incorporate them herein by reference.

708. The defendants deny the allegations contained in paragraph 708 of the plaintiff's complaint.

709. The defendants deny the allegations contained in paragraph 709 of the plaintiff's complaint.

710. The defendants deny the allegations contained in paragraph 710 of the plaintiff's complaint.

AS TO COUNT XXXVIII

711. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 710 of the plaintiff's complaint and incorporate them herein by reference.

712. The defendants deny the allegations contained in paragraph 712 of the plaintiff's complaint.

713. The defendants deny the allegations contained in paragraph 713 of the plaintiff's complaint.

AS TO COUNT XXXIX

714. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 713 of the plaintiff's complaint and incorporate them herein by reference.

715. The defendants deny the allegations contained in paragraph 715 of the plaintiff's complaint.

716. The defendants deny the allegations contained in paragraph 716 of the plaintiff's complaint.

717. The defendants deny the allegations contained in paragraph 717 of the plaintiff's complaint.

718. The defendants deny the allegations contained in paragraph 718 of the plaintiff's complaint.

719. The defendants deny the allegations contained in paragraph 719 of the plaintiff's complaint.

720. The defendants deny the allegations contained in paragraph 720 of the plaintiff's complaint.

721. The defendants deny the allegations contained in paragraph 721 of the plaintiff's complaint.

722. The defendants deny the allegations contained in paragraph 722 of the plaintiff's complaint.

723. The defendants deny the allegations contained in paragraph 723 of the plaintiff's complaint.

724. The defendants deny the allegations contained in paragraph 724 of the plaintiff's complaint.

725. The defendants deny the allegations contained in paragraph 725 of the plaintiff's complaint.

726. The defendants deny the allegations contained in paragraph 726 of the plaintiff's complaint.

727. The defendants deny the allegations contained in paragraph 727 of the plaintiff's complaint.

728. The defendants deny the allegations contained in paragraph 728 of the plaintiff's complaint.

729. The defendants deny the allegations contained in paragraph 729 of the plaintiff's complaint.

730. The defendants deny the allegations contained in paragraph 730 of the plaintiff's complaint.

731. The defendants deny the allegations contained in paragraph 731 of the plaintiff's complaint.

732. The defendants admit the allegations contained in paragraph 732 of the plaintiff's complaint. To the extent that paragraph 732 alleges any wrongdoing, the defendants deny the allegations contained in paragraph 732 of the plaintiff's complaint.

733. The defendants deny the allegations contained in paragraph 733 of the plaintiff's complaint.

734. The defendants deny the allegations contained in paragraph 734 of the plaintiff's complaint.

735. The defendants deny the allegations contained in paragraph 735 of the plaintiff's complaint.

736. The defendants deny the allegations contained in paragraph 736 of the plaintiff's complaint.

AS TO COUNT XL

737. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 736 of the plaintiff's complaint and incorporate them herein by reference.

738. The defendants deny the allegations contained in paragraph 738 of the plaintiff's complaint.

739. The defendants deny the allegations contained in paragraph 739 of the plaintiff's complaint.

740. The defendants deny the allegations contained in paragraph 740 of the plaintiff's complaint.

741. The defendants deny the allegations contained in paragraph 741 of the plaintiff's complaint.

AS TO COUNT XLI

742. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 741 of the plaintiff's complaint and incorporate them herein by reference.

743. The defendants deny the allegations contained in paragraph 743 of the plaintiff's complaint.

744. The defendants deny the allegations contained in paragraph 744 of the plaintiff's complaint.

AS TO COUNT XLII

745. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 744 of the plaintiff's complaint and incorporate them herein by reference.

746. The defendants deny the allegations contained in paragraph 746 of the plaintiff's complaint.

747. The defendants deny the allegations contained in paragraph 747 of the plaintiff's complaint.

748. The defendants deny the allegations contained in paragraph 748 of the plaintiff's complaint.

AS TO COUNT XLIII

749. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 748 of the plaintiff's complaint and incorporate them herein by reference.

750. The defendants deny the allegations contained in paragraph 750 of the plaintiff's complaint.

751. The defendants deny the allegations contained in paragraph 751 of the plaintiff's complaint.

752. The defendants deny the allegations contained in paragraph 752 of the plaintiff's complaint.

AS TO COUNT XLIV

753. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 752 of the plaintiff's complaint and incorporate them herein by reference.

754. The defendants deny the allegations contained in paragraph 754 of the plaintiff's complaint.

755. The defendants deny the allegations contained in paragraph 755 of the plaintiff's complaint.

756. The defendants deny the allegations contained in paragraph 756 of the plaintiff's complaint.

AS TO COUNT XLV

757. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 756 of the plaintiff's complaint and incorporate them herein by reference.

758. The defendants deny the allegations contained in paragraph 758 of the plaintiff's complaint.

759. The defendants deny the allegations contained in paragraph 759 of the plaintiff's complaint.

AS TO COUNT XLVI

760. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 759 of the plaintiff's complaint and incorporate them herein by reference.

761. The defendants deny the allegations contained in paragraph 761 of the plaintiff's complaint.

762. The defendants deny the allegations contained in paragraph 762 of the plaintiff's complaint.

763. The defendants deny the allegations contained in paragraph 763 of the plaintiff's complaint.

AS TO COUNT XLVII

764. The defendants repeat and reallege their answers to the allegations contained in paragraphs 1 through 763 of the plaintiff's complaint and incorporate them herein by reference.